

EXHIBIT 2

Email from PSC Refusing to
Provide Expert
Deposition Dates

Matt H. Cline

From: Ben Gastel <beng@bsjfirm.com>
Sent: Tuesday, December 29, 2015 11:23 AM
To: Puig, Yvonne K.; Schramek, Adam T.; 'Hoffman, Eric (eric.hoffman@nortonrosefulbright.com)'; Chris J. Tardio; Matt H. Cline
Cc: Daniel Clayton; Randy Kinnard; George Nolan; Bill Leader; 'Chalos, Mark P. (mchalos@lchb.com)'; Martin, Annika K.; Gerard Stranch
Subject: Depositions of PSC Common Experts

All,

This email is in response to your request to take the depositions of PSC's common experts disclosed on December 16. Below is the list of attorneys who will be responsible for scheduling the depositions of each expert. On all such communications please continue to include Mark Chalos and me on those communications, but the below lawyers will ultimately be the coordinating attorney for each expert:

Joachimsthaler: Gerard/Ben
Russo, Kessler: Chalos/Annika Martin
Baddley, Gray, Dubberke, Winikur, Rauck: Bill Leader/George Nolan
Dawson/Stephenson: Dan Clayton

Further, to reiterate a point Gerard made yesterday in an email, some of our experts might be used in reply/rebuttal and as a result, we will not agree to produce them following each report. We are happy to produce all of our experts, I just want to make sure that we are all on the same page on this issue.

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****Please note that our firm changed addresses effective June 29, 2015.**

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